

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF GEORGIA

JEFFREY D. CORDTZ,	)	
	)	
Plaintiff,	)	
	)	CIVIL ACTION FILE
vs.	)	
	)	1:21-CV-02003-MHC-LTW
JOHNSON LEGAL OFFICES, L.L.C.,	)	
FCI LENDER SERVICES, INC. and	)	
LARRY W. JOHNSON,	)	
	)	
Defendants.	)	

**DEFENDANT JLO'S AND DEFENDANT LWJ'S  
RESPONSE IN OPPOSITION TO PLAINTIFF'S MOTION FOR  
EXTENSION OF TIME FOR PLAINTIFF TO FILE A MOTION FOR  
SUMMARY JUDGMENT AND TO RESPOND TO DEFENDANT JLO'S  
AND DEFENDANT LWJ'S MOTION FOR SUMMARY JUDGMENT**

COME NOW JOHNSON LEGAL OFFICES, L.L.C. ("JLO") and LARRY W. JOHNSON ("LWJ"), co-Defendants in the above-styled civil action, and hereby respond in opposition to Plaintiff's Motion for Extension of Time and show this honorable Court in support thereof as follows:

Without citing any statutory or case authority, Plaintiff's requests more time to respond to a summary judgment motion and to file his own summary judgment motion. However, there has been plenty of time for Plaintiff to do everything he needed in order to file a response to any summary judgment motion or to file his own summary judgment motion. Plaintiff mentions affidavits that have to be filed, but Plaintiff never chose to send those entities any discovery or to depose their

representatives, even though he has been aware for months of their existence and applicability to this case. Plaintiff also seeks additional time to file his own summary judgment motion, but again he brought this lawsuit and has had plenty of time to prepare for and file his own summary judgment motion. Additionally, the Scheduling Order and Guidelines for Discovery and Summary Judgment Practice (the “Scheduling Order”) was entered on October 8, 2021, without objection from the Plaintiff. Defendant JLO and Defendant LWJ were able to comply in filing their “sprawling” motion for summary judgment (as described by Plaintiff). Plaintiff has also had more than ample time to prepare and file his own motion for summary judgment and he has failed and refused to do so. Defendant JLO and Defendant LWJ were able to comply with the Scheduling Order in that regard and Plaintiff should not be given a windfall of time to respond to any summary judgment motion or to file his own summary judgment when he has had more than ample time to do so.

Additionally, Defendant JLO and Defendant LWJ wanted to take this opportunity to explain again the differences in amounts arguably owed in some of the documents and pleadings addressed herein. The Affidavit of James Maffuccio filed in Gwinnett County only seeks interest from October 20, 2015, going forward. Plaintiff has testified in his deposition filed herein that he has not made a payment since September of 2012. Consequently, additional interest is owed at least from October 1, 2012, through October 19, 2015 (or for an additional 1,109 days, which is over three years), which explains why an increased amount may be sought on the total debt owed by Plaintiff. The Superior Court of Gwinnett County, Georgia will

ultimately address the proper amount owed. Defendant JLO and Defendant LWJ are simply attempting again (for at least the third time) to explain to Plaintiff and his counsel why the actual amount he owes may be significantly higher than what was previously sought. Of course, seeking less than the full amount owed would be the prerogative of the lender. In any event, to the extent that Plaintiff or his counsel argue in the future that this issue has not been explained to them, Defendant JLO and Defendant LWJ will refer them back to this pleading.

WHEREFORE, Defendant JLO and Defendant LWJ request that this honorable Court deny Plaintiff's Motion for Extension of Time and once again request that this honorable Court grant Defendant JLO's and Defendant LWJ's Motion for Summary Judgment.

Respectfully submitted this 13<sup>TH</sup> day of December, 2021.

JOHNSON LEGAL OFFICES, L.L.C.

By: 

Larry W. Johnson  
Georgia Bar No. 394896  
Attorney for Defendant JLO and  
Defendant LWJ

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CordtzJLOExtendMotionResp01




CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing DEFENDANT JLO'S AND DEFENDANT LWJ'S RESPONSE IN OPPOSITION TO PLAINTIFF'S MOTION FOR EXTENSION OF TIME FOR PLAINTIFF TO FILE A MOTION FOR SUMMARY JUDGMENT AND TO RESPOND TO DEFENDANT JLO'S AND DEFENDANT LWJ'S MOTION FOR SUMMARY JUDGMENT was served upon all parties electronically via the Court's system, plus the following who was also served by mailing same by United States First Class Mail in a properly addressed envelope with adequate postage affixed thereon to ensure delivery, addressed as follows:

Shimshon Wexler, Esq.  
S WEXLER, L.L.C.  
2244 Henderson Mill Road  
Suite 108  
Decatur, GA 30345  
Attorney for Plaintiff

This 13<sup>TH</sup> day of December, 2021.

  
\_\_\_\_\_  
Larry W. Johnson  
Attorney for Defendant JLO and  
Defendant LWJ

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